

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION**

ANDREW L. COLBORN,

Plaintiff,

vs.

**NETFLIX, INC.; CHROME MEDIA LLC,
F/K/A SYNTHESIS FILMS LLC; LAURA
RICCIARDI; AND MOIRA DEMOS,**

Defendants.

Civil No.: 19-CV-484-PP

**DECLARATION OF JAMES A. FRIEDMAN
IN SUPPORT OF MOTION TO DISMISS**

I, James A. Friedman, declare as follows:

1. I am one of the attorneys for the defendants in the above-captioned action. I have personal knowledge of the matters set forth herein.
2. In the fall of 2006, plaintiff Andrew L. Colborn ran for Sheriff of Manitowoc County. In response to a public records request, the Manitowoc County Clerk provided copies of public records concerning the November 7, 2006 election. I have appended to this Declaration as Exhibit 1 a true and correct copy of a sample ballot from that election, provided by the Manitowoc County Clerk, showing plaintiff Andrew L. Colborn as the Republican candidate for Sheriff in Manitowoc County. I have appended to this Declaration as Exhibit 2 a true and correct copy of the vote Tally Sheet from Manitowoc County for the November 7, 2006 election, provided by the Manitowoc County Clerk, showing plaintiff Andrew L. Colborn as the Republican candidate for Sheriff of Manitowoc County and as having received more than 12,000 votes.

3. In the spring of 2003, plaintiff Andrew L. Colborn ran for Town Constable for the Town of Kossuth. In response to a public records request, the Town Clerk for the Town of Kossuth provided public records concerning the April 1, 2003 election. I have appended to this Declaration as Exhibit 3 a true and correct copy of plaintiff Andrew L. Colborn's Nomination Papers for the Town Constable for the Town of Kossuth for the April 1, 2003 election, provided by the Town of Kossuth Town Clerk.

4. I have appended to this Declaration as Exhibit 4 a true and correct copy of the transcript from February 20, 2007, in the jury trial of the case captioned *State of Wisconsin v. Steven A. Avery*, Manitowoc County Circuit Court, Case No. 05-CF-381, including the testimony of plaintiff Andrew L. Colborn.

5. I have appended to this Declaration as Exhibit 5 a true and correct copy of the transcript from February 12, 2007, in the jury trial of the case captioned *State of Wisconsin v. Steven A. Avery*, Manitowoc County Circuit Court, Case No. 05-CF-381.

6. I have appended to this Declaration as Exhibit 6 a true and correct copy of the Decision and Order on State's Motion to Exclude Blood Vial Evidence dated January 30, 2007, in the case captioned *State of Wisconsin v. Steven A. Avery*, Manitowoc County Circuit Court, Case No. 05-CF-381.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 9th day of May, 2019.

GODFREY & KAHN, S.C.

/s James A. Friedman

James A. Friedman, SBN 1020756
One East Main Street
Suite 500
Madison, WI 53703-3300
T: (608) 284-2617
F. (608) 257-0609
jfriedman@gklaw.com

20587940.1